

# Exhibit 8

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

Priorities USA, Rise, Inc., and the  
Detroit/Downriver Chapter of the A.  
Philip Randolph Institute,

Plaintiffs,

v.

Dana Nessel, in her official capacity as  
Attorney General of the State of  
Michigan,

Defendant.

NO. 19-13341

JUDGE MARK A GOLDSMITH

MAGISTRATE R. STEVEN  
WHALEN

**DECLARATION OF NSE UFOT  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR A  
PRELIMINARY AND  
PERMANENT INJUNCTION**

I, Nse Ufot, declare as follows:

1. My name is Nse Ufot. I am currently the Executive Director of the New Georgia Project Action Fund.

2. The New Georgia Project Action Fun is a 501(c)(4) nonprofit. Its mission is to build political power within the New American Majority—people of color, young people aged 18 to 29 years old, and unmarried women—through civic and voter engagement. In particular, we focus on mobilizing underrepresented and underserved communities of color.

3. Engaging people on voting and getting them to the polls is a critical part of our mission. Transporting voters to the polls is an essential part of that work.

4. Providing transportation to the polls is a common organizing tactic in Georgia and elsewhere. Voter transportation is done in many ways.

5. We have organized “souls to the polls” campaigns which involve partnering with churches or other religious institutions to encourage parishioners to vote and to provide transportation to the polls. These campaigns are executed with church vans, hired transportation, and by organizing networks of volunteers with big cars and individuals who were able to drive voters.

6. We have also rented 15-person vans for our staff to transport voters to the polls.

7. One thing that makes transporting voters to the polls so important is the time it takes for those voters who rely on public transportation to vote. Take, for example, an hourly wage worker who uses public transportation to go to what they think is the site of their polling place. Simply making it to the polling place might be a 30- to 45-minute ride or longer, and if the polling place has changed or closed, the voter needs to make another bus ride, which will potentially double their transit time. To address situations like this, NGP has posted staffers and vehicles at sites that have been closed or where significant numbers of voters have

been reassigned to alternate voting locations, so that they can transport affected voters to the correct polling places.

8. NGP has also partnered with senior living communities and assisted living facilities to help bring the people who live there to the polls. Although assisted living facilities often have a vehicle to take people to appointments, we can provide additional capacity to their day-to-day operations so that a greater number of their residents can engage in the political process.

9. Our most recent development in the voter transportation area has been partnering with companies like Uber and Lyft to provide voters with free and discounted rides to the polls. NGP and other organizations pay those companies a negotiated flat fee for each ride to the polls.

10. One memorable example of a nontraditional voter transportation program involved Pastor Raphael G. Warnock, the now Senior Pastor of Ebenezer Baptist Church, and Tauheed Epps, known professionally as the rapper 2Chainz. In 2016, Pastor Warnock and 2Chainz rented tour busses to both publicize the importance of voting and to transport voters from Morehouse and Spelman Colleges, two historically black colleges, as well as Ebenezer Baptist Church to an early voting site in Fulton County, Georgia.

11. All of these examples of voter transportation are important components of NGP's get-out-the-vote efforts, and many involve spending money.

In the case of NGP's partnership with Uber, we pay a company to pay its drivers to transport voters to the polls. When NGP rents vehicles for its staffers to drive, it is paying money for the purpose of transporting voters to the polls. If Georgia law prohibited spending money to hire vehicles and drivers, it would significantly disrupt our organizing work.

12. Organizing around absentee voting is also an important part of mobilizing minority and young voters.

I certify under penalty of perjury and pursuant to the laws of the United States that the preceding is true and correct.

Executed on 1-27-20

By: \_\_\_\_\_

Nse Ufot

Executive Director, NGP